

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: : CHAPTER 13
Suzanne Mitchell :
Debtor : BANKRUPTCY NO.: 16-17721-AMC

RESPONSE TO MOTION FOR RELIEF

Debtor, by her attorney, Brandon Perloff, Esq., by way of Response to Movant's motion, respectfully represents the following:

1. -2. Admitted.
3. Neither admitted, nor Denied. Movant's averment contains facts in documents on record before the Court. The Debtor does not have the requisite knowledge to attest to the authenticity and veracity of said documents.
4. Denied. The averments set forth in this paragraph is denied to the extent that they contain conclusions of law to which no response is necessary.
5. Denied. The Debtor does not have the requisite knowledge to attest to intentions of the Movant.
6. Denied. The Debtor does not have the requisite knowledge to attest to the veracity of the premise to which this averment is based, that a foreclosure proceeding was to be instituted by the Movant.
7. Denied. By way of further response, the Debtor intends to cure any post - petition mortgage payments that may be due at this time.
8. Denied. Movant's averment does not call for a response. Any factual averments contained in the corresponding paragraph are denied.
- 9.-12. Denied. The averments set forth in this paragraph is denied to the extent that they contain conclusions of law to which no response is necessary.

WHEREFORE, Debtor pray that the Movant's request for relief be denied.

Respectfully submitted,

Date: 7/12/19

/s/ Brandon Perloff
Brandon Perloff Esquire.
Attorney for Debtor